

File No. 4921-002

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Case No. 19-20959 GLT
	:	
Glen H. Green and Esther L. Green,	:	Chapter 13
	:	
Debtors	:	Document No.
	:	
The Money Source, Inc.,	:	Related to Document No. 71
	:	
Movant,	:	
	:	
vs.	:	
	:	
Glen H. Green and Esther L. Green,	:	
	:	
Respondents.	:	

**DEBTORS' RESPONSE TO MOTION FOR
RELIEF FROM THE AUTOMATIC STAY**

Debtors, Glen H. Green and Esther L. Green, by their attorneys Zebley Mehalov & White, and Daniel R. White, Esquire respond to the Motion for Relief from the Automatic Stay as follows:

1-3 and 9-10. Admitted.

4-8 and 11-14. Denied. Debtors demand strict proof of the averments of paragraphs 4-8 and 11-14.

DEBTOR'S DEFENSES

1. Debtors have a confirmed Chapter 13 plan dated November 20, 2020, which pays Movants monthly payment and cures pre-petition arrearage.
2. Debtors are currently in arrearage with their Chapter 13 plan payments by one (1) month having missed the February 2021, payment according to the Chapter 13 Trustee's website.

3. Debtors' payment arrearage was due to the death of their adult daughter in November 2020, which left Debtors as the guardians and sole support of her two (2) sons.
4. Debtors have recently secured social security benefits for the two (2) boys and will bring their plan payments current by the end of March.
5. Debtors also take the position that Movant has over \$100,000.00 equity cushion in the property based on the payoff and market value figures in their motion.
6. Accordingly, Debtors believe that this equity cushion and their monthly plan payments provide adequate protection to Movant.

WHEREFORE, the Debtors, Glen H. Green and Esther L. Green, respectfully request this Court to Deny the Motion for Relief from the Automatic Stay.

Dated: March 18, 2021

ZEBLEY MEHALOV & WHITE, P.C.
By

/s/ Daniel R. White

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